

**BECKER & POLIAKOFF LLP**

Helen Davis Chaitman  
45 Broadway  
New York, New York 10006  
(212) 599-3322

**Hearing Date and Time:**

May 1, 2014 at 10:30 a.m.

**Objection Deadline:**

April 24, 2014

*Attorneys for Defendants Susanne Stone  
Marshall, Adele Fox, Marsha Peshkin,  
and Russell Oasis*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,  
Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff  
Investment Securities LLC,

Plaintiff,

v.

SUSANNE STONE MARSHALL; ADELE  
FOX; MARSHA PESHKIN; RUSSELL  
OASIS; A & G GOLDMAN PARTNERSHIP;  
and PAMELA GOLDMAN,

Defendants.

Adv. Pro. No. 08-01789 (BRL)  
SIPA LIQUIDATION  
(Substantively Consolidated)

Adv. Pro. No. 14-01840 (SMB)

**NOTICE OF MOTION FOR A  
STAY OF THE PROCEEDING  
AND AN EXTENSION OF TIME  
PURSUANT TO  
FED. BANKR. R. 9006 AND  
LOCAL RULE 9006-2**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law,  
dated April 17, 2014; the Declaration of Helen Davis Chaitman, dated April 17, 2014;

and upon all prior pleadings and proceedings herein; the undersigned, counsel to defendants Susanne Stone Marshall, Adele Fox, Marsha Peshkin, and Russell Oasis, individually and on behalf of the classes they represented, (collectively, the “Florida Plaintiffs”), will move before the Honorable Stuart M. Bernstein on **May 1, 2014, at 10:30** on the Florida Plaintiffs’ motion (1) to stay this proceeding until the United States Court of Appeals for the Eleventh Circuit decides the pending appeal in *Marshall v. Capital Growth Company, et al.*, Case No. 11-11250; (2) and to extend the Florida Plaintiffs’ time to respond to the Trustee’s pending application to enforce a permanent injunction and the automatic stay [ECF Nos. 2-5] until 14 days after the Court rules on this motion or the stay is lifted, if the requested stay is granted.

**PLEASE TAKE FURTHER NOTICE** that written objections to the motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **April 24, 2014** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon the undersigned.

**PLEASE TAKE FURTHER NOTICE** that replies to objections, if any, must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **April 29, 2014** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein).

**BECKER & POLIAKOFF LLP**

April 17, 2014  
New York, New York

By: /s/ Helen Davis Chaitman  
Helen Davis Chaitman  
45 Broadway  
New York, New York 10006  
(212) 599-3322

*Attorneys for Defendants Susanne  
Stone Marshall, Adele Fox, Marsha  
Peshkin, and Russell Oasis*

**CERTIFICATE OF SERVICE**

I, Chelsey Davis, hereby certify that I caused true and correct copies of the foregoing Notice of Motion, the Declaration of Helen Davis Chaitman, and the Memorandum of Law in Support of the Florida Plaintiffs' Motion for a Stay of the Proceeding and an Extension of Time to be served upon the parties in this action who receive electronic service through CM/ECF, and by electronic mail upon:

Marc E. Hirschfield  
David J. Sheehan  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111  
(212) 589-4200  
Fax : (212) 589-4201  
[bhaa@bakerlaw.com](mailto:bhaa@bakerlaw.com)  
[dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 17, 2014

/s/ Chelsey Davis